

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Nathaniel Salley and Joseph Salley, as Personal	)	C/A No. 2:10-cv-00791-DCN
Representatives of the Estate of Annie Salley,	)	
	)	
Plaintiffs,	)	<b>AFFIDAVIT</b>
	)	<b>OF</b>
Versus	)	<b>KATHRYN S. HOOPS</b>
	)	
Heartland-Charleston of Hanahan, SC, LLC,	)	
d/b/a Heartland Healthcare Center –	)	
Charleston; HCR Manorcare, Inc.; Manor Care,	)	
Inc.; Manor Care of America, Inc.; HCR	)	
Manorcare Medical Services of Florida, LLC;	)	
The Carlyle Group,	)	
	)	
Defendants.	)	

PERSONALLY appeared before me, Kathryn S. Hoops, who, being duly sworn, deposes and says:

1. I am a Vice President and Director of Tax, Internal Audit and Risk Management for HCR ManorCare, Inc.

2. I have reviewed the records in my possession relative to corporate structure of the Defendants and the chart attached as Exhibit A is an accurate description of the current corporate structure.

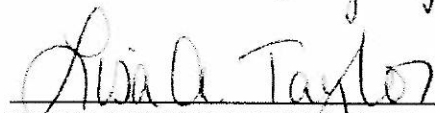
3. The attached records are copies of records which are kept in the ordinary course of business by this office.

FURTHER AFFIANT SAYETH NOT.



Kathryn S. Hoops, Vice President  
Director of Tax, Internal Audit and Risk  
Management

SWORN TO AND SUBSCRIBED before me  
this 11<sup>th</sup> day of August, 2010.



NOTARY PUBLIC FOR OHIO

MY COMMISSION EXPIRES: 1/26/15



LISA A. TAYLOR  
NOTARY PUBLIC - OHIO  
MY COMMISSION EXPIRES 01-26-2015

